

STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

Sasol North America, Inc.  
(Formerly CONDEA Vista  
Company)  
CALCASIEU PARISH

ENFORCEMENT TRACKING NOS.

AE-NP-98-0204, AE-PP-00-0010;  
AE-PP-00-0010A: AE-PP-00-0094;  
AE-PP-00-0060; and AE-P-00-0043

Agency Interest No. 3271

PROCEEDINGS UNDER THE  
ENVIRONMENTAL QUALITY ACT,  
La. R.S. 30:2001, ET SEQ.

**SETTLEMENT AGREEMENT**

The following settlement is hereby agreed to between Sasol North America, Inc. (formerly CONDEA Vista Company) ("Sasol") and the Louisiana Department of Environmental Quality (the "Department"), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001 et seq. (the "Act").

I.

Sasol owns and operates a chemical manufacturing facility, located near VCM Plant Road, Westlake, Calcasieu Parish, Louisiana (the "Facility").

II.

In October 1998, the Department issued Notice of Potential Penalty No. NP-98-0204 to Sasol, alleging that Respondent's ethylene expansion project of 1990 triggered the provisions of 40 CFR Part 60, Subpart NNN and that Sasol did not submit an initial start-up notification, did not conduct continuous monitoring of distillation vents, did not submit semiannual reports, and

did not conduct performance testing of the control device for the vents, all as required by that rule. In addition, the Department alleged two violations of leak detection and repair regulations. Sasol denied each of these allegations. Subsequently, the Department and Respondent agreed that Respondent would request a determination from the United States Environmental Protection Agency, Region 6, ("USEPA") concerning the applicability of NSPS Subpart NNN. In July 1999, Respondent submitted an applicability determination request to USEPA. In September 1999, USEPA sent Sasol a request for information pursuant to Section 114 of the Clean Air Act concerning, *inter alia*, whether the ethylene expansion project described in AE-NP-98-0204 triggered NSPS NNN. In 2001, EPA Region 6, sent a letter to Respondent officially closing out any issues related to the 114 Request.

### III.

On May 19, 2000, the Department issued Penalty Assessment No. AE-P-00-0043 to Sasol in the amount of \$16,210.00 for two alleged violations of LAC 33:I.3917.A. Sasol timely requested a hearing on this penalty assessment.

### IV.

On May 17, 2000, the Department issued to Sasol Notice of Violation and Potential Penalty ("NOPP") Tracking No. AE-PP-00-0010, alleging various violations of 40 C.F.R. Part 60, Subparts K, Ka, Kb, NNN, and RRR, the Act, and the Louisiana Air Quality Regulations. On May 19, 2000, the Department issued Sasol Notice of Violation and Potential Penalty Tracking No. AE-PP-00-0094, alleging various violations of 40 C.F.R. Part 60, Subpart A, the Act, and the Louisiana Air Quality Regulations. On May 19, 2000, the Department issued Sasol Notice of Violation and Potential Penalty Tracking No. AE-PP-00-0060, alleging various violations of the Louisiana Air Quality Regulations, LAC 33: III and Section 2057 of the Act. In

each of these three NOPPs, the Department notified Sasol that the issuance of a penalty assessment was being considered for the violations alleged therein.

V.

Representatives of Sasol and the Department met on various occasions to discuss mitigating factors and circumstances surrounding the alleged violations. Sasol submitted written comments to the Department concerning (a) the NOPPs, (b) certain mitigating factors concerning the alleged violations, and (c) the penalty factors under La. R.S. 30:2025(E)(3) and LAC 33:I.Ch. 7.

VI.

On May 3, 2001, the Department amended NOPP No. AE-PP-00-0010 and issued AE-PP-00-0010A to delete some of the alleged violations.

VII.

In subsequent discussions, Sasol agreed to include in any settlement proposal all potential deviations from air regulations or air permits applicable to the Sasol Westlake facility occurring through the end of calendar year 2002. Such potential deviations subject to this settlement agreement are identified on Exhibit 1, attached hereto and made a part hereof. In addition, on April 30, 2003, Sasol reported to the Department that it had recently determined that a portion of its facility was subject to 40 C.F.R. Part 63, Subpart PPP and that Sasol was late in submitting several reports required by that rule and in meeting certain portions of the leak detection and repair requirements of that rule. These additional matters are also described on Exhibit 1 for inclusion in this settlement.

## VIII.

Sasol denies that it has committed any violations and/or denies that it is liable for any fines, forfeitures or penalties.

## IX.

Nonetheless, Sasol, without making any admission of liability under state or federal statute or regulation, agrees to undertake, and the Department agrees to accept, the settlement amount discussed in Paragraph X below and performance of the Beneficial Environmental Project ("BEP") further described in Paragraph XI of this Settlement Agreement in full and complete settlement of the claims set forth in the Penalty Assessment and NOPPs and the matters included on Exhibit 1.

## X.

The Department has examined the "nine factors" provided in La. R.S. 30:2025(E)(3), the rules in LAC 33:I.Ch. 7, Sasol's mitigating factors assessment, and the significant costs and environmental benefits of the BEP. Based upon this review, the Department agrees to accept, and Sasol agrees to pay, a payment in the amount Fifty Thousand and No/100s (\$50,000.00) Dollars, of which Two Thousand Five-Hundred Ten (\$2510.00) Dollars represents the enforcement costs incurred by the Department, and the performance of the Beneficial Environmental Project, as described below, in full settlement of the violations alleged in the NOPPs, the Penalty Assessment and the matters described on Exhibit 1.

## XI.

To resolve the claims addressed in this Settlement Agreement, Sasol agrees to expend a minimum of One Hundred Sixty Five Thousand (\$165,000.00) Dollars to implement the Beneficial Environmental Project ("BEP") described below:

a.

By no later than two hundred twenty-five (225) days after the date Sasol receives notice that this Settlement Agreement is final, Sasol will reduce the amount of well water required for process cooling in the Ethylene Unit at Sasol North America's Lake Charles Chemical Complex by a minimum of 2,600,000 gallons per year by collecting and using uncontaminated storm water. During rain events storm water runoff will be collected and pumped directly into the Ethylene Cooling Tower. The minimum amount of water reduction is based on average annual rainfall in southwest Louisiana. The proposed construction consists of the installation of a sump and two pumps adjacent to Outfall 004. The project includes all piping, instrumentation, electrical, and control systems to support the installation.

Currently, all process water for the Lake Charles Chemical Complex is drawn from several wells owned and operated by Sasol located throughout the facility. Each of these wells removes water from the 500 foot sand of the Chicot Aquifer. The use of storm water for cooling in the Ethylene Unit will allow a reduction in the amount of water that must be removed from the Chicot Aquifer.

b.

By entering into this Settlement Agreement, Sasol hereby certifies that, as of the effective date of the Settlement Agreement, Sasol is not required to perform or develop the BEP by any federal, state or local law or regulation; nor is Sasol required to perform or develop the BEP by any other agreement, grant or as injunctive relief in this or any other case.

c.

Sasol will submit semi-annual progress reports to the Enforcement Division of the Department and shall include a description of the project, tasks completed, tasks remaining, the

percentage completed, and money expended on each project through the date of the report. The first progress report will be due on or before July 15, 2006, and the next progress report will be due to the Department on or before January 15, 2007. Within fifteen (15) days of completion of the BEP, Sasol shall submit a BEP Completion Report including a certification that the BEP has been fully implemented pursuant to the provisions of this Settlement Agreement. In addition, Sasol shall include documentation of the expenditures made in connection with the BEP as part of the BEP Completion Report.

d.

If Sasol does not expend at least 95% of the projected \$165,000.00, Sasol shall submit a check to the department for the amount by which the total expenditures are below 95% of \$165,000.00 along with the BEP Completion Report.

e.

Within 30 days after the one year anniversary date of the completion of the BEP, and annually thereafter for a period of two additional years, Sasol shall submit a report to the Department to document the quantity of stormwater collected and reused in the Ethylene Cooling tower during the prior year.

## XII.

Sasol agrees the Department may consider the NOPPs, the Penalty Assessment and supporting documentation on which they are based, the mitigation documentation submitted by Sasol, and this Settlement Agreement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department and, in any such action, Sasol shall be estopped from objecting to the above referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Sasol's

compliance history.

### XIII.

This agreement shall be considered a final order of the secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement. Respondent expressly reserves, however, the right to administrative or judicial review of the actions of the Department acting upon, interpreting and/or applying the terms of this agreement.

### XIV.

This settlement is being made in the interest of settling the Department's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing and settling civil penalties set forth in La. R.S. 30:2025(E).

### XV.

The total amount of money expended by Respondent on cash payments to DEQ and on the beneficial environmental project, as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30: 2050.7(E)(1).

### XVI.

Sasol has caused a public notice advertisement to be placed in a newspaper of general circulation in Calcasieu Parish. The advertisement, in form, wording, and size, was approved by the Department and announced the availability of this Settlement Agreement for public view and comment. Sasol has submitted a proof-of-publication affidavit to the Department, and as of the date this Settlement Agreement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice. Any comments received by the

Department have been considered prior to the execution of this Settlement Agreement.

XVII.

The penalty payment described in Paragraph X is to be made within thirty (30) days from Sasol's receipt of notice in writing of the Secretary's signature, which notice shall be provided in writing, through certified mail, addressed to Sasol North America, Inc., Attn: General Counsel, 900 Threadneedle Street, Houston, TX 77079. If payment is not received or the BEP described in Paragraph XI is not performed, this Settlement Agreement is voidable at the option of the Department. Interest on any amount not timely paid accrues at the rate of 1 and 1/2% per month. Payments are to be made payable to the Department of Environmental Quality and mailed to the attention of Darryl Serio, Office of Management and Finance, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303, with a copy mailed to the attention of Peggy Hatch. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit 2.)

XVIII.

In consideration of the above, the claims for penalties for any of the Department's Findings of Fact and Areas of Concern or other factual allegations described in this Settlement Agreement are hereby compromised and settled in accordance with the terms of this Settlement Agreement.

XIX.

The Department agrees that in consideration of the execution of this Settlement Agreement and the actions to be undertaken by Sasol pursuant to this Settlement Agreement, the Department shall not initiate or maintain any administrative or enforcement proceeding, lawsuit, claim or cause of action against Sasol with respect to the facts and/or violations alleged in: 1) the



NOPP No. AE-NP-98-0204 issued by the Department to Sasol in October 1998; 2) the NOPP No. AE-PP-00-0010, issued by the Department to Sasol on May 17, 2000, as amended on May 3, 2001; 3) the NOPP No. AE-PP-00-0094, issued by the Department to Sasol on May 19, 2000; 4) the NOPP, No. AE-PP-00-0060, issued by the Department to Sasol on May 19, 2000; 5) the Penalty Assessment No. AE-PP-00-0043, issued by the Department to Sasol on May 19, 2000; and 6) the matters described in Exhibit 1.

XX.

The provisions of this Settlement Agreement shall apply to and be binding upon the State of Louisiana and upon Sasol and the officers, agents, servants, employees, successors, and assigns of both parties.

XXI.

Each undersigned representative of a party certifies that such representative is fully authorized to enter into the terms and conditions of this Settlement Agreement and to legally execute and legally bind such party to this document.

THUS DONE AND SIGNED on behalf of Sasol North America, Inc., before me, Notary,  
in Lake Charles, Calcasieu Parish, Louisiana, on this 30 day of November, 2005.

Sasol North America, Inc.

BY: William Patrick Brown  
(Signature)

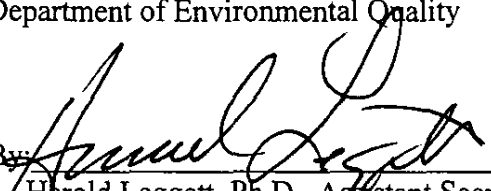
William Patrick Brown  
(Printed)

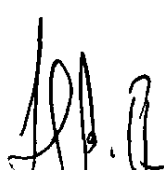
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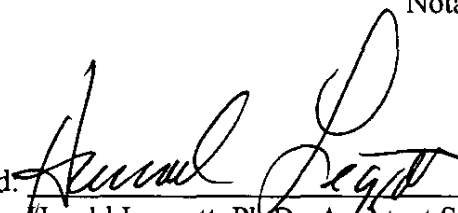
Jenny Clifton Loux  
Notary Public #008391

THUS DONE AND SIGNED on behalf of the Louisiana Department of Environmental  
Quality, before me, Notary, in Baton Rouge, East Baton Rouge Parish, Louisiana, on this 16<sup>th</sup>  
day of February, 2006.

STATE OF LOUISIANA  
Mike D. McDaniel, Ph.D., Secretary  
Department of Environmental Quality

By:   
Harold Leggett, Ph.D., Assistant Secretary  
Office of Environmental Compliance

  
Notary Public

Approved:   
Harold Leggett, Ph.D., Assistant Secretary

## Exhibit 1

### I. Permit Deviations Reported under Title V Permits Through End of Calendar Year 2002

Date	Unit	Description
9/23/1998	ALU-FD-2 Calciner Fines Baghouse	One 6 minute period of >10% opacity.
4/19/1999	ALU-FD-2 Calciner Fines Baghouse	One 6 minute period of >10% opacity.
1 <sup>st</sup> Quarter 2000	ALU-FD-1, ALU-FD-3, ALU-FD-4, ALU-FD-5, ALU-FD-558, ALU-FD- 8, ALU-GB-552, ALU-XFD 3&4 (Calciner Feed Silo Baghouse, Calciner Air Grinder Baghouse, Calciner Blend Silo Baghouses, Transfer and Fluidized Air Dust Filter, Calciner Supersack Loading Baghouse, Niro Dryer Dust Collector Vent, and the Drytec Dryer Alumina Blend Silo Baghouses)	Specific Permit Condition No. 2, Part 70 Permit No. 2565-V0. Quarterly baghouse inspection was not performed.
Weeks of: July 3, July 10, July 24, Aug. 7, Aug. 21, Sept. 11, Sept. 25, Oct. 2, Oct. 23, Oct 30, Nov. 20, Nov. 27	ALU-FE-1 Alumina Unit Fugitives	Specific Permit Condition No. 3, Part 70 Permit No. 2565-V1 (LAC 33:III.2121). Weekly pump inspections in VOC service not performed.
Jan.21, Jan. 31, Mar. 23, July 28, Aug. 15, Sept.14, Oct.13, 26, Nov. 12, 2000	ALU-XGB-2 Drytec Dryer Dust Collector Vent Stack.	State Only Specific Condition 1. The ethyl alcohol content in this stream was not sampled at the required daily frequency (on each of these days one sample was missed).
Startup on Nov. 7, 2000	ALU-NA-SCRB Nitric Acid Scrubber System	State Only General Condition 6. Construction of the nitric acid system was completed and started up November 7, 2000. The notification of construction completion and startup was submitted on November 30, 2000. This was not within the required 10-day time frame.
First 3 Quarters of Calendar Year 2000	ALU-FE-1 Alumina Unit Fugitive Emissions	LAC 33:III.2121. The Formic Acid system should have been tagged and monitored for the Leak Detection and Repair (LDAR) program when the system was started-up (January 2000). The tagging and monitoring for this system did not begin until the last quarter of 2000.
Jan. 28, 30 and Feb. 23-26, 2000	ALU-XGB-2 Drytec Dryer Duct Collection Vent Stack.	State Only General Condition III. Maximum permitted maximum hourly butanol emissions (7.95 lb/hr in Permit No. 2565-V0) were exceeded. The exceedance determination is a result of a change in the basis of emissions calculation. The basis of calculation has been changed due to better understanding of the process. The permit has since been modified to increase the maximum hourly limit to 32.15 lbs./hr.
Feb. 24 and Mar.2, 2000	ALU-XGB-2 Drytec Dryer Duct Collection Vent Stack.	State Only General Condition III. Exceeded non-TAP VOC maximum hourly limit on these two days. The current permit (2565-V1) does not have a limit on non-

Date	Unit	Description
		TAP VOC.
Nov. 26, 2000	ALU-XGB-2 Drytec Dryer Duct Collection Vent Stack	Visible emissions were seen on this date. The incident lasted approximately 30 minutes. Inspection of the baghouse revealed that the pulsating air piping in module A had been dislodged and some of the bags and cages in modules B and C were not completely snapped down. These problems were promptly repaired.
Dec. 17, 2000	ALU-FD-3 Calciner Air Grinder Baghouse.	Visible emissions were seen on this date for approximately 15 minutes. The problem was promptly resolved by changing the operating conditions.
Week of: June 17, 2001	ALU-FE-1 Alumina Unit Fugitive Emissions	LAC 33:III.2121. Two pumps in VOC service were not visually inspected.
Week of: July 1-7, 2001	ALU-FE-1 Alumina Unit Fugitive Emissions. LAC 33:III.2121.	Two pumps in VOC service were not visually inspected.
Oct. 8, 9, 13, 15, 2001	ALU-FD-1 Calciner Feed Silo Baghouse	Visible emissions were seen on these dates. [No other information available so I am going to assume that the problem was ongoing but sporadic during this time period, then was fixed]
Feb. 9, 2002	ALU-GB-552 Niro Spray Dryer	State General Condition III. Exceeded butanol maximum hourly emission rate.
October 14, 2002	ALU-D8-113 A, B, or C.	Exceedance of maximum hourly PM limit

## II. Reportable Quantity Releases (DEQ only) at LCCC since 1999 (minus VCM)

Date	Unit	Description
3/5/1999	ETH	Release of greater than RQ (estimated 15.3 lbs) of uncombusted butadiene in flaring during startup following a planned partial maintenance outage.
3/27/00	ALC	Internal roof failure of FB353 in the Alcohol Unit caused emissions of n-hexane to the atmosphere. Initially reported as greater than maximum hourly permit limits, but revised estimates indicated that emissions were within permit limit.
5/26/00	LAB	Benzene railcar loading arm spill of 35 lbs. of Benzene. The loading arm became partially disconnected at the cam lock fitting due to the vibration of the "Snappy Joe" connector device, resulting in the release, which sprayed outside the spill containment pan. This was an unforeseen equipment failure. The valves to the unloading arm were immediately closed and the pump shut down. The are was washed down into secondary containment and to the process water collection system. Operations implemented a mechanical modification to prevent recurrence.

Date	Unit	Description
7/28/00	ETH	A small leak in a drain line on the deethanizer feed exchanger caused a release of approximately 251 lbs of ethylene and 185 lbs of ethane (RQ for each 100 lbs.) The leak was observed at 13:05. At 13:45, the inlet to the system was isolated and the material was flared. The leak continued until all of the material was flared – at 16:45. The leak was repaired prior to putting the line back into service.
11/04/00	LAB	W302 start-up line leaked from a pinhole leak causing a release of 168 lbs. of benzene and smaller amounts of normal paraffin (29 lbs.), LAB (2 lbs.) and HF (2 lbs.) – all of which were below the respective RQs, except for benzene which has an RQ of 10 lbs. The leak caused about 5 gpm of liquid to be sprayed from the pinhole. Operations immediately lowered pressure on the line and directed water spray to the line to minimize flashing to the atmosphere. A temporary clamp was used to stop the release. The piece of leaking pipe was later removed and replaced after the line was cleared. Adjacent piping was also inspected before the unit was returned to service. The pinhole leak was a premature equipment failure caused by internal pipe corrosion.
12/12/00	ETH	11.7 lbs. of benzene was emitted from flaring during shutdown. The flare meets all NSPS and NESHAP standards as a control device. This type of emission is now covered by the permit, through a permit amendment.  The shutdown resulted while preventative maintenance was being performed on the ETH unit charge gas compressor.
1/7/01	ETH	Flaring during routine startup following maintenance released 10.4 lbs of Butadiene (RQ 10 lbs.)
7/24/01	LAB	Flange leak on W-401 (distillation column) overhead pump line released 107.5 lb Benzene. This incident was reported as an exceedance, but in fact, there was no violation because this leak is subject to the HON-LDAR rules (leak was from a flange subject to the equipment and work practice standards of 40 CFR Part 63, Subpart H.) As Sasol repaired the leak within the time limits authorized by such rule, there was no unauthorized release.
9/21/01	LAB	A utility valve on the W301 Benzene Oxygen Stripper was left cracked open releasing 5619 lbs Benzene due to maintenance error. The release was discovered 8 days later as a result of the area monitoring alarm system detecting a release. Because the location of the valve on the column was 70 feet into the air, the material was significantly dispersed. Although this factor made the release more difficult to detect, it also resulted in the release causing less impact. The area monitoring system did not detect any concentrations in excess of any OSHA standards. As soon as the location of the release was found, the valve was closed. The responsible employee was counseled.
11/27/01	LAB	A heat exchanger leak released 47.6 lbs of benzene from a cooling tower. This was not a violation as the heat exchanger is subject to HON and the leak was repaired immediately, well within the 45 day period authorized under the HON rules.
3/3/02	ETH	Flaring due to an unplanned unit shutdown released 29 lbs. of benzene (RQ 10 lbs.). The shutdown was necessitated when a coupling failed (sheared between the gear box and high pressure turbine rotor on the charge gas compressor, causing the compressor to trip. Operations tried to restart the compressor, but were unsuccessful and had to shut the unit down, necessitating the flaring. Flaring was minimized by keeping the cracking furnaces on hot steam standby, putting the fractionation section on recycle, and cutting the ethane feed. The flare meets NSPS and NESHAP control standards.

Date	Unit	Description
5/5/02	ETH	A relief valve on the propylene compressor surge drum, 3 <sup>rd</sup> stage, lifted for approximately 3 minutes, causing a release of 8105 lbs of Propylene. The release occurred during start-up of the Ethylene Unit after a turnaround. The startup caused overpressure on this compressor surge drum. There was no off-site impact. The valve was isolated and resealed. There is no reportable quantity for propylene under CERCLA, EPCRA or DEQ rules. Under Louisiana State Police rules, the RQ is 100 lbs. (or 1000 lbs. if LAC 33:V.10111.E.2. is applicable) as a flammable gas for which an OSHA MSDS is required.
7/23/02	LAB	A valve flange leak on a line in the LAB unit leaked a mixture of paraffin, olefin, and benzene to grade. An estimated 1285 lbs. of benzene evaporated. The flange was immediately blocked in and as much of the spilled material as possible was recovered. Because this was more in the nature of a blow out of the gasket/flange rather than a fugitive leak, this incident is treated as a spill rather than as a leak subject to LDAR requirements.
8/27/02	LAB	A flange leak on supplier railcar caused a spill to the ground and approximately 50.6 lbs of benzene evaporated to the air. It was determined that the leak was caused by a bad seal on the railcar. This railcar is not owned or operated by Sasol. Sasol protectively reported the release.

### III. Releases Below RQ

Date	Unit	Description
1/11/00	ALC	Excess emissions from Tank RB506C, an ethyl alcohol storage tank, were discovered on January 11, 2000 when the tank, which was out of service, was inspected. The inspection revealed that the floating roof was in such poor condition that it was not providing effective control. Sasol reported that this deterioration had likely contributed to excess emissions for some time period prior to the inspection, but the date could not be ascertained with certainty. It was determined that the excess emissions, assuming no control efficiency, would exceed the total VOC permit limits by 0.331 lbs./hr or about 7.92 lbs/day. No RQ's were exceeded. A new carbon steel roof was installed before the tank was put back into service.
10/18/99	ALC	During an inspection of Tank FB553, wet crude alcohol storage tank, it was determined that the floating roof had failed at some time due to corrosion. This was reported to LDEQ. The tank was taken out of service for repairs and the floating roof was repaired prior to the tank being put back into service. It was estimated that the annual average hourly emissions were exceeded by 7.7 lbs/hr of n-butanol (1.4 TPY), 0.28 lbs/hr of other VOCs (about 0.05 TPY) and 0.01 lbs/hr of ammonia (about 3.65 lbs/yr).
8/16/00	ETO	A possible release of approximately 9.2 lbs. of ethylene oxide occurred on August 17, 2000 from the flare accumulation drum at the Ethoxylation Unit. The flare seal pot drains to the flare accumulation drum. Provided the accumulation drum contains water the flare system is sealed. During normal operations, an operator manually drains the accumulator drum when required. During this event, it could not be verified that water remained in the accumulator drum. The amount released was below the reportable quantity for Ethylene Oxide (10 lbs.), but the event was reported.
10/17/00	ETH	Sasol was using a series of carbon beds to control emissions from Tank T7-916 during tank cleaning operations. The first bed was spent, so vapors were routed to the second bed. A contractor who was instructed to remove spent carbon from the first bed mistakenly, began removing carbon from the second bed by vacuuming. About ¾ of the carbon was removed before the problem was discovered. The release of about 0.11 lbs. of benzene occurred when the man way of the carbon bed was opened to install the vacuum hose.

### IV. Non-emission Deviations

Date	Unit	Description
Feb. 5, 2001	NPU	Failure to repair valve within 15 days as required by LAC 33:III.2121 (Work practice deviation)
December 11 and 19, 2001	ETH	Continuous monitoring excursions under 40 CFR 63. On these two dates, there was a temporary outage of the data recording historian (PIMS) used to record the kg of steam per liter of wastewater for HON compliance. On December 11, the outage lasted for 19 hours and 45 minutes. Pursuant to HON requirements at least 18 hours of data must be gathered and recorded each operating day. On December 19-20, 2001, the excursion lasted 50 hours. The excursions were reported on Sasol's semiannual HON report.
	ETH	The design steam stripper in the Ethylene unit is used to comply with the SOCMH HON wastewater standards in 40 CFR 63.138. However, Sasol uses monitoring for the steam stripper that differs from the monitoring specified in the rule. Sasol requested EPA and DEQ approval of its alternative monitoring system in October 2000.
June 2002	ETH	Failure to collect the monthly design steam stripper sample required under 40 CFR 61.3547(a)(1)..
Sept. 23, 2002	NPU	Failure to repair leaking pump within 15 days as required under LAC 33:III.2121.
September 2002	ETH	Failure to attempt first repair on leaking methanol pump within 15 days as required by applicable LDAR standards.
March 2003	ETO	<p>In March 2003, Sasol reported to LDEQ that it had determined that 40 CFR Part 63, Subpart PPP the NESHAP for Polyether Polyols Production was applicable to portions of its ETO Unit. The NESHAP subpart PPP became effective on June 1, 1999 with a compliance date of June 1, 2002. Sasol reported to LDEQ that because the ETO unit is already subject to numerous other standards, the practical implications of the applicability of Subpart PPP were not significant, but that Sasol had not complied with several notification and reporting requirements. Specifically, Sasol's report to LDEQ indicated that Sasol was in compliance with the process vent standards of Subpart PPP at all relevant times since the June 1, 2002 compliance date; that additional testing would be required to demonstrate compliance; that there were no storage vessels, wastewater streams or heat exchangers subject to PPP; and that the Sasol fugitive components subject to Subpart PPP were already being monitored under La. Non-HON MACT which was equivalent in all respects except that a lower leak definition was applicable to some components under Subpart PPP. Sasol indicated that since the PPP applicability date, only 4 components were found to be leaking within the meaning of PPP that were not defined as leaking under the prior non-HON MACT program. All 4 were repaired.</p> <p>Sasol identified the following items which were needed to be completed in order to fully comply with Subpart PPP and submitted a schedule for completion of each:</p> <ul style="list-style-type: none"> <li>• Review the SOPs for the unit to ensure that they meet and/or are reformatted for the Startup, Shutdown, and Malfunction Plan</li> <li>• Submit all required late reports and notification letters (Notification of precompliance, notification of compliance status, periodic reports)</li> <li>• File for a modification of the Title V permit to indicate applicable requirements</li> </ul>
October 16, 1998 Notice of Violation and Potential Penalty AE-NP-98-0204		Failure to make initial attempt at repair for three leaking components within 5 days as required by 40 CFR Part 60, Subpart VV
October 16, 1998 Notice of		Failure to make initial attempt at repair for three leaking components within 5



Date	Unit	Description
Violation and Potential Penalty AE-NP-98-0204		days as required by 40 CFR Part 63, Subpart H